

Notes of Brie Hedgereth

25-91, 1:36pm

Returned Call to

Brie Byrd

(509) 747-7151

Inland Power & Light

spue p.m. 7-22-

5KVA GE trans (pole)

- released oil - 1 qt.
(seeped)

- 978 ppm PCB

- cleaned up that night

- replaced soil - went to 12 inch

- 2nd sample set up)

- farming community on edge of field.
(off road)

- advised re record keeping

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460TOXIC SUBSTANCES CONTROL ACT
INVESTIGATION SUMMARY

11. Facility Name

INLAND POWER & LIGHT

1. INVESTIGATION IDENTIFICATION

2. Region/State

12. Street

Date 3/11/82 Inspector Number 1605 Daily Sequence 1

10

E 320 Second Ave

3. Inspecting Org. 4. Contract Number 5. Contract Work Order
C ☐ E ☒ S ☐6. Facility Function 7. Invest. Type 8. Reason for Investigation
US GBC NSR13. City 14. State 15. ZIP Code
SPRINGFIELD MD 99029. Referral Agency 10. Warrant Required
Yes ☐ No ☐16. DUNS Number 17. SIC Codes
WAD 008958274

SAMPLE INFORMATION

18. Sample Sequence Number 19. State Sample Number 18. Sample Sequence Number 19. State Sample Number

20. CAS Number 21. Project Code 20. CAS Number 21. Project Code

22. Sample Medium 23. Date Collected 22. Sample Medium 23. Date Collected

24. Lot or Other Codes 25. Date Shipped 24. Lot or Other Codes 25. Date Shipped

26. Sample Identification 26. Sample Identification

27. Amount Before Sampling 27. Amount Before Sampling

28. Sample Description 28. Sample Description

OTHER FACILITIES

29. Manufacturer/Processor (Other than above) 29. Manufacturer/Processor (Other than above)

30. City 31. State 32. ZIP Code 30. City 31. State 32. ZIP Code

33. DUNS Number 33. DUNS Number

RECORDS

34. Original Records 34. Original Records

35. Sample Delivered To 36. Date 35. Sample Delivered To 36. Date

37. Remarks 37. Remarks

INSPECTION DOCUMENTS

38. Credentials Presented 39. Notice of Inspection 40. Notice of Confidentiality 41. Chain of Custody 42. Receipt for Samples/Documents 43. Declaration of Confidentiality
☐ ☐ ☐ ☐ ☐ ☐

44. Inspector's Name 45. Inspector's Signature

JUN 19 1986
F.A. 125

INSPECTION EVALUATION-

Name & title evaluator

Mingo Partridge, EPS

RCRA		TSCA	X	FIFRA	
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ACTION TAKEN

- ☒ No Action Indicated
☐ Violation Assessment
☐ Letter of Non-Compliance
☐ Referral for Admin. Civil Penalty
☐ Referral for Criminal Action
☐ Refer to State

Michael Watson

Name of inspector

3/11/82

Date of inspection

Inland Power & Light CoE. 320 Second AveSpokane, WA 99202

Establishment Name & Address

COMMENTS:

no violations noted. Annual reports were
not inspected.

James M. Ciert 4/13/82

CONCUR

Do NOT CONCUR

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

M/S 524

Certified MailLaboratory Analysis Notice

Inland Power & Light Co.
E. 320 Second Avenue
Spokane, WA, 99202

Attn: Arnold Brauff, Operations Manager

Dear Mr. Brauff:

On 3/11/82, samples were obtained as part of an inspection at Inland Power & Light Co., Spokane, Washington. These samples have been analyzed for polychlorinated biphenyl (PCB) by the Environmental Protection Agency analytical laboratory. A copy of that lab report is being forwarded to you with this letter.

The analysis involves testing of the sample for seven characteristic and distinct types of PCB. They are: Aroclor 1221, 1232, 1242, 1248, 1254, 1260 and 1016. Only the types of Aroclor found will be reported. There were no PCBs detected at 1 ppm or greater level.

Inquiries or correspondence should be directed to Jim Everts, EPA Region 10, Permits and Compliance Branch, M/S 524, 1200 Sixth Avenue, Seattle, Washington, 98101; telephone: (206) 442-2632.

Sincerely,

Donald A. Donaldson, Chief
Compliance Section

April 15, 1982

Enclosure

DAD:MP:wmh

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

PCB INSPECTION:

Inland Power and Light Co.
E. 320 Second Ave.
Spokane, Washington 99202
(509) 747-7151

Michael Watson
3-11-82

I visited the headquarters (address above) of the company at 1:35 PM. Was referred by the secretary to Mr. Arnold Brauff, P.E., Operations Manager. I presented my credentials to Mr. Brauff, and we went to his office where I explained the purpose of my visit.

Mr. Brauff informed me that their main office location (this was evident to me already) had no storage or repair facilities, but that I should direct my efforts to their storage yard located eight miles west of Spokane on I-90. This is the so called Four Lakes Site, located just before the Medical Lake exit on the south side of I-90. He notified the Technical Services Superintendent, Mr. John Johnson (who manages the storage yard site) by radio that He should return to his office at the site and that I would soon be out for a tour. I then thanked Mr. Brauff, indicated that I would locate Mr. Johnson, and departed for the Four Corners site.

On arriving on the site about 2:30 PM, I met with Mr. John Johnson in his office, presenting him with my credentials, Notice of Inspection and Notice of Confidentiality. I gave him two copies of the Notice of Inspection, after explaining that he should give one to the chief officer of business. I also mailed a copy (by regular mail) to Mr. Brauff on 3-16-82. Mr. Johnson then took me on a tour of the facility, during which I took photos, samples, etc.

All transformers which fail or are taken off line by the Co. are not rebuilt, because it is cheaper to replace them with a new unit rather than by rebuilding the old one. Thus, all failed or off line transformers are shipped out to waste oil dealers, etc., scrap metal dealers, etc., and are ~~not~~, according to Mr. Johnson, not usually taken to the yard. Accordingly, no transformers were in evidence at the facility. All apparatus consisted exclusively of capacitors and voltage regulators.

Capacitors are returned to the yard from the line only in the event of a leakage. Those that are PCB filled are stored in a special area which is roofed, diked, and made of concrete with no obvious cracks or seams. To me the storage area looked good. Several capacitors, all labeled as being PCB capacitors, were stored in the area described. As far as I could determine, ALL fluid containing devices at the yard were labeled, PCB or not (non PCB labels on the non-PCB, etc.) Mr. Johnson indicated that their staff had recently undergone a very thorough labelling effort throughout their company. All devices were lined up in very orderly rows in the yard.

A great variety of voltage regulators were present in the yard. I had a cursory view of their records, found them to be seemingly adequate, and took samples and photos. These were:

Sample #225156, Sub A (EPA LAB NO. 10032): approx 10 ml clear, yellowish oil from McGraw-Edison Voltage Regulator, Serial No. 81-ZH63A024, 219 amp, 167 kva, in outside storage yard.

Sample #225156, Sub B (EPA LAB NO. 10033): approx 10 ml clear, yellowish oil from Alyce-Chalmers Voltage Regulator, S.N. 3-3740-001-01-30, 100 amp, 76.2 kva.

Both samples were taken by Mr. Johnson opening lower drain stopcock on device, and allowing fluid to run into 20 ml EPA vial held by me.

I looked at records, and from what I could tell they seemed satisfactory. I then gave Mr. Johnson a copy of the Receipt for Samples. I asked about waste oils, and Mr. Johnson indicated that whenever possible, the oils are taken along with the transformer by the person ~~to whom the leaky transformer is~~ manifested to haul away the leaky transformer per se. All PCB contaminated material is taken to Arlington, according to Mr. J., and my quick scan of the records noted manifests, etc. Some barrels of waste oil were outside in the yard, but I did not sample them. In general, the operation was a very clean and orderly appearing one.

Michael Watson Ph.D, 3-18-82

No PCB Transformers at site

? Was it marked

Did they have annual reports? Do they have trans service?

Michael Watson

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE

SEATTLE, WASHINGTON 98101



REPLY TO
ATTN OF:

NOTICE OF INSPECTION UNDER THE TOXIC SUBSTANCES CONTROL ACT
Mail Stop 524

INLAND POWER + LIGHT

Name of Firm:

Date Inspection Commenced: 3-11-82

Firm Address: 6320 SECOND

Hour: 1:35 PM

SPOKANE, WA 99202

Reason for Inspection: ROUTINE INSPECTION

☒ For the purpose of inspecting (including taking samples, photographs and other inspection activities) premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with such premises have been complied with.

☒ For the purpose of inspecting (including taking samples, photographs and other inspection activities) conveyances used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with the conveyances have been complied with.

☐ In addition, this inspection extends to (circle appropriate letters):

- A) Financial data
- B) Sales data
- C) Pricing data
- D) Personnel data
- E) Research data

The nature and extent of the data to be inspected as specified in A through E above is as follows:

Name of Person to Whom Notice
of Inspection Was Delivered:

JOHN JOHNSON

SUPV. TECH SERVICES

TITLE

Dist: 1 cy Plant Manager
1 cy PCB Violation Coordinator
1 cy Inspector's Files

Signature of EPA Employee:

Michael Watson

TOXICOLOGIST 3-11-83

TITLE & DATE

TSCA Notice of Inspection

Authority to Conduct Inspections

By authority of Section 11 of the Toxic Substances Control Act (15 USC 2601) an authorized representative of the Administrator of the United States Environmental Protection Agency may enter and inspect, at reasonable times, any establishment facility, or other premises in which chemical substances or mixtures are manufactured, processed, stored, or held before or after their distribution in commerce and any conveyance used to transport chemical substances, mixtures, or such articles in connection with distribution in commerce.

Scope of Inspections

Inspections conducted under Section 11 of the Toxic Substances Control Act (15 USC 2601) extend to all things within the premises or conveyance inspected (including records, files, papers, processes, controls, and facilities) bearing upon whether the requirements of the Toxic Substances Control Act applicable to the chemical substances or mixtures within the premises or conveyance have been complied with.

However, inspections shall not extend to the following types of data unless the nature and extent of such data are described with reasonable specificity in the written notice presented to the owner, operator, or agent in charge of the premises or conveyance:

1. financial data
2. sales data (other than shipment data)
3. pricing data
4. research data (other than research data required by the provisions of the Toxic Substances Control Act or under a rule promulgated thereunder)

Penalties for Failure to Allow Inspection

Section 15 of the Toxic Substances Control Act makes it unlawful for any person to fail or refuse to permit entry or inspection as required by Section 11 or to fail or refuse to permit access to or copying of records. Section 16 provides for both civil and criminal penalties for violations of Section 15. Section 17 authorizes specific enforcement, including the obtaining of an injunction to restrain any violations of Section 15.



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

TSCA INSPECTION CONFIDENTIALITY NOTICE

REPLY TO
ATTN OF: Mail Stop 524

Facility Inspected: *INLAND POWER - LIGHT*

Date Inspected: *3-11-82*

Address of Facility: *6300 24th Ave
Spokane, WA 99202*

Name of person at the facility
to whom this notice given:

JOHN JOHNSON
MICHAEL WATSON
SURTECH SERVICES

TITLE

Name of chief officer
of business:

Arnold Brauff
Operations Manager
Date mailed to chief
officer: *3-16-82*

Name of EPA Inspector:

MICHAEL WATSON
SURTECH

It is possible that EPA will receive public requests for release of data and/or documents obtained by inspectors during inspection of the facility indicated above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552, EPA regulations issued thereunder, 40 CFR Part 2, and the Toxic Substances Control Act Section 14. EPA is required to make documents available in response to FOIA requests unless the Administrator of the agency determines that the data or documents are exempt from disclosure.

Please provide us with a statement specifying any information obtained during our inspection you believe should be exempt from disclosure. This will facilitate the Agency's timely response to any public inquiries, and evaluation of your company's claim of confidentiality.

Your statement should be addressed to: Document Control Officer, Pesticides & Toxic Substances Branch, M/S 524, address above, and should reach this address no later than 30 days after your receipt of this notice. Failure to submit a written request that specified information be characterized as confidential, privileged, or exempt from disclosure within 30 days will be treated by EPA as a waiver of your claims for confidentiality regarding the inspection data. Any non-exempt data may be made available to the public without further notice to you.

3-11-82
date received by owner/operator

John Johnson
signature of Plant Manager

Dist: 1 copy Plant Manager
1 copy Chief Officer of Business
1 copy PCB Violation Coordinator
1 copy Inspector's Files

Appendix V

U.S. Environmental Protection Agency

Receipt for Samples

Regional Address:

U.S. EPA REGION 10
PERMITS + COMPLIANCE BR.
1200 SIXTH AVE, M/S 524
SEATTLE, WA 98101

Name of Plant Manager
or Similar Official:

Firm Name:

INLAND POWER AND LIGHT

Firm Address:

E. 320 SECOND
SPOKANE, WA. 99202

Sample Numbers:

225156 SUB A
SUB B

Samples Collected: (Describe fully the time, place, date and type of sample, number of containers for each type of sample)

225156 SUB A ~ 10 ML FLUID FROM McGRAW-ED. VOLT Reg. S.N. 81-2H63A024
3-11-82, 3 PM, STORAGE YD, 4 LAKES UNREMARKED.

SUB B ~ 10 ML FLUID FROM ALICE CHALMERS VOLT Reg. S.N. 3-3740-001-01-30
3-11-82, 3 PM, STORAGE YD, 4 LAKES UNREMARKED.

Acknowledgement of Plant Manager or Similar Official

The undersigned acknowledges that the samples described above have been collected:

Signature:

John John

Title:

Sup. Tree Service

Duplicate Samples for each Type of Sample Taken:

Sample #

Requested and provided

Not requested

7

X

Name of person who
collected samples:

John Johnson

Title of Collector: Supt. Tree Services

Signature of Collector:

Distribution: one copy to Facility Plant Manager
original to PCB Violation Coordinator
one copy for Inspector's Records

ESTABLISHMENT INSPECTION REPORT

1. VISIT NO.

41926

2. REGION NO. 10	3. INSPECTOR NO. 1605	4. DATE OF VISIT 3-11-82	5. ESTAB. REGISTRATION NO. PCB	
6. ESTABLISHMENT NAME AND ADDRESS (Including Street, city, state, ZIP code, county and phone number) Inland Power and Light Co. E. 320 Second Ave. Spokane, WA 99202 (509) 747-7151		7. RELATED FIRMS		
8. TYPE OF ESTABLISHMENT Electrical Utility	9. TYPE OF OWNERSHIP coop	10a. TOTAL ANNUAL SALES ----	10b. PERCENT PESTICIDES ---	
11. NAMES AND TITLES OF OF PRINCIPAL OFFICERS, PARTNERS OR OWNERS Arnold Brauff, P.E., Operations Manager (509) 747-7151 John Johnson, Technical Services Supt.				
12. PERSONS INTERVIEWED (Give name, title, phone number and responsibility) Arnold Brauff, Operations Manager (509) 747-7151 John Johnson, Technical Services Supt.				
13a. PHYSICAL SAMPLES COLLECTED		13b. DOCUMENTARY SAMPLES		13c. LABELS REVIEWED WITHOUT SAMPLES
EPA REGISTRATION NO.	SAMPLE NO.	EPA REGISTRATION NO.	SAMPLE NO.	EPA REGISTRATION NO.
Oil from Voltage Regulator	McGraw-Edison, S.N. 81-ZH53A024	225156 SUB A	EPA Lab Code 10032	
Oil from Alycè Chalmers Voltage Regulator	S.N. 3-3740-001-01-30	225156 SUB B	EPA Lab Code 10033	
14. REMARKS Presented credentials, N/I, H/C, R/S. Inspection was conducted at the company's storage and maintenance yard, located at the Four Lakes facility *8 miles east of Spokane near the Medical Lake Interchange I-90. No transformers were at the site, only capacitors and voltage regulators. All capacitors with PCB were stored properly in a special, diked, roofed area.				
15. SIGNATURE OF INSPECTOR Michael Watson <i>Michael Watson</i>		16. INSPECTOR'S STATION Seattle, WA		

EPA Lab Code for Sub A = 10032
for Sub B = 10033

U.S. ENVIRONMENTAL PROTECTION AGENCY COLLECTION REPORT				01. SAMPLE NO. 225156	
26. DATE COLLECT 3-11-82	12. PROJ CODE ---	02. REGION NO. 10	11 INSP NO. 1605	03. REGISTRATION NO. -----	10. ESTABLISHMENT NO. -----
27. DATE(S) SHIPPED ----- Poss					
04. PRODUCT NAME Sub A: approx 10 ml clear, yellowish, oil taken from McGraw-Edison Voltage Regulator Serial No. 81-ZH63A024. 219 amp, 167 kva, in outside storage yard Sub B: approx 10 ml clear, yellowish, oil taken from Alyce Chalmers voltage regu- lator, Serial No. 3-3740-001-01-30, 100 amp, 76.2 kva. in outside storage yard.					
PRODUCER ESTABLISHMENT					
STREET ADDRESS		08. CITY		09. STATE	ZIP CODE
SHIPPER					
STREET ADDRESS		08. CITY		09. STATE	ZIP CODE
DEALER Inland Power and Light Co.					
STREET ADDRESS E. 320 Second Ave.		CITY Spokane,		STATE WA	ZIP CODE 99202
07 RESPONSIBLE PARTY CODE <input type="checkbox"/>					
05 SHIPPER/MFG/USER/DIST NO. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> DO NOT ZERO FILL					
<p>Field 05 and 07 apply to the company or user against whom enforcement action will be taken and are to be completed by the regional office. The responsible party code will be filled with the codes: M—Manufacturer; S—Shipper, U—User or D—Distributor.</p> <p>The Shipper/Mfg./User/Dist. No. will be assigned from the SMUD list.</p> <p>ATTENTION:</p> <p>All numbers on this copy refer to PEMS computer fields.</p>					



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

REPORT OF ANALYSIS

1. SAMPLE NO 10032-10053	2. DATE COLLECTED 3/11/82
3. REGION 10	4. EPA REG. NO.
5. ESTABLISHMENT NO.	

6. DESCRIPTION OF SAMPLE
2 X 16 ml vials of oil

7. NAME AND ADDRESS OF ESTABLISHMENT WHERE SAMPLE WAS COLLECTED (Include ZIP code) Inland Power & Light Co. E. 320 Second Ave. Spokane, WA 99202	8. PRODUCT NAME 9. LOT OR CODE NUMBER(S)
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10. NAME AND ADDRESS OF PRODUCER (If different from 7 above)

11. RESULTS OF ANALYSIS

Analyzed both oil samples for PCBs including Aroclors 1016, 1221, 1232, 1242, 1248, 1254 and 1260 by GC/EC with dual column confirmation. PCBs were not detected in either sample at the 1ppm level.

R. H. Rieck

Analyst: R. H. Rieck, Chemist

LABORATORY COMMENTS

SIGNATURE OF LAB SUPERVISOR <i>AK Sahler</i>	14. LABORATORY EPA Region 10	15. DATE 3/31/82
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